



MEMORANDUM

DATE: April 14, 2011

TO: Rose Longoria, Yakama Nation Fisheries Resource Management Program

FROM: Colin Wagoner, P.E., RIDOLFI Inc.

SUBJECT: Comments on the Lower Willamette Group's *Draft Treatment Technology Evaluation Tools Memorandum*, submitted on March 15, 2011

Ridolfi has reviewed the Lower Willamette Group's (LWG's) Draft Treatment Technology Evaluation Tools memorandum. This memorandum provides background on how sediment treatment technologies have been evaluated to date and how they will be carried forward into the Feasibility Study. The memo provides LWG's lists of in situ and ex situ treatment technologies for sediments and explains in general terms how Sediment Management Areas (SMAs) where in situ or ex situ technologies are applicable.

Comments:

1. Table 1 presents cleanup criteria for unrestricted upland beneficial use. EPA is in the process of assembling a similar table and the values should be compared for consistency.
2. Table 2 presents information on various technologies. The comment on thermal desorption indicates that COC reductions of between 80 and 90 percent could be achieved. My understanding is that higher reductions can be achieved for a number of classes of organic contaminants such as creosote-related chemicals.
3. The entry for Vittrification on Table 2 is odd. It seems highly unlikely that Vittrification would be implementable or cost effective at the site.
4. Item 3. On the top of page 5 states that "in situ treatment will be effective in addressing exposure and risk in **most** SMUs based on recent case studies. This is a strong statement that should be backed up with information from the case studies. EPA should consider consulting with RPMs from sites referenced including Grasse River in New York.
5. Attachment 1, Table 2, last two entries. The same as comment 3. Please present supporting information on in situ treatment.